

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

SILVERROCK DEVELOPMENT COMPANY,
LLC, *et al.*,

Debtors.¹

Chapter 11

Case No. 24-11647 (MFW)

(Jointly Administered)

SILVERROCK DEVELOPMENT COMPANY, LLC
AND RGC PA 789, LLC,

Plaintiffs,

Adv. Pro. No. 25-50450 (MFW)

v.

RICHARD A. GOETZ, LEHN E. GOETZ, AND
DOES 1-20,

Defendants.

**NOTICE OF AGENDA OF MATTERS SCHEDULED
FOR HEARING ON DECEMBER 16, 2025 AT 3:00 P.M. (ET)
BEFORE THE HONORABLE MARY F. WALRATH, AT
THE UNITED STATES BANKRUPTCY COURT FOR THE
DISTRICT OF DELAWARE, 5TH FLOOR, COURTROOM NO. 4**

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number, as applicable, are: SilverRock Development Company, LLC (5730), RGC PA 789, LLC (5996), SilverRock Lifestyle Residences, LLC (0721), SilverRock Lodging, LLC (4493), SilverRock Luxury Residences, LLC (6598), and SilverRock Phase I, LLC (2247). The location of the Debtors' principal place of business and the Debtors' mailing address is 343 Fourth Avenue, San Diego, CA 92101.

THIS HEARING WILL BE CONDUCTED IN-PERSON AND VIA ZOOM. PARTIES AND WITNESSES ARE PERMITTED, BUT NOT REQUIRED, TO APPEAR IN PERSON. THE COURT HAS NO PREFERENCE.

TO ATTEND THE HEARING REMOTELY, PLEASE REGISTER USING THE ECOURT APPEARANCES TOOL ON THE COURT'S WEBSITE AT www.deb.uscourts.gov OR CLICK THE BELOW LINK: <https://ecf.deb.uscourts.gov/cgi-bin/nysbappearances.pl>.

PARTIES ARE REQUIRED TO REGISTER FOR THE HEARING NO LATER THAN 4:00 P.M. (ET) ONE BUSINESS DAY BEFORE THE HEARING. YOU MUST USE YOUR FULL NAME WHEN LOGGING INTO ZOOM OR YOU WILL NOT BE ALLOWED INTO THE MEETING.

AFTER REGISTERING YOUR APPEARANCE, YOU WILL RECEIVE A CONFIRMATION EMAIL. ZOOM INFORMATION WILL BE SENT OUT PRIOR TO THE HEARING.

I. RESOLVED MATTER:

1. Third Motion Pursuant to Bankruptcy Rule 9019, Local Rule 9013-1 and Sections 105(a) and 363(b) of the Bankruptcy Code Authorizing and Approving the Unwind Agreement By and Between the Debtors and the Settling Creditors [[Docket No. 787](#); filed 11/7/2025]

Response Deadline: November 21, 2025 at 4:00 p.m. (ET)

Responses Received: None.

Related Documents:

- i. Certification of No Objection [[Docket No. 816](#); filed 11/24/2025]
- ii. Order Pursuant to Bankruptcy Rule 9019, Local Rule 9013-1 and Sections 105(a) and 363(b) of the Bankruptcy Code Authorizing and Approving the Unwind Agreement By and Between the Debtors and the Settling Creditor [[Docket No. 817](#); filed 11/25/2025]

Status: On November 25, 2025, the Court entered an order resolving this matter. Accordingly, a hearing with respect to this matter is no longer necessary.

II. MATTERS SUBMITTED UNDER CERTIFICATION:

2. Combined Eighth Monthly and Final Fee Application and Expense Application of Armstrong Teasdale LLP, as Co-Counsel to the Debtors and Debtors in Possession, for Allowance of Compensation and Reimbursement of Expenses Incurred for the Monthly Period from March 1, 2025 through April 30, 2025 and Final Application for Allowance of Compensation and Reimbursement of Expenses for the Final Period from August 5, 2024 through April 30, 2025 [[Docket No. 790](#); filed 11/10/2025]

Response Deadline: December 1, 2025 at 4:00 p.m. (ET)

Responses Received: None.

Related Documents:

- i. *See Schedule 1*, attached
- ii. Certification of Counsel Regarding Armstrong Teasdale LLP's Eighth Monthly and Final Application for Fees and Expenses [[Docket No. 825](#); filed 12/2/2025]

Status: On December 2, 2025, counsel submitted a proposed form of order approving the final fee application under certification of counsel. Accordingly, a hearing with respect to this matter is only necessary to the extent the Court has any questions.

3. Debtors' Fourth Motion for Entry of an Order (I) Further Extending Exclusive Periods to File and Solicit Plan; and (II) Granting Related Relief [[Docket No. 822](#); filed 12/1/2025]

Response Deadline: December 9, 2025 at 4:00 p.m. (ET)

Responses Received: None.

Related Documents:

- i. Certification of No Objection [[Docket No. 837](#); filed 12/10/2025]

Status: On December 10, 2025, the Debtors filed a certificate of no objection with respect to this matter. Accordingly, a hearing with respect to this matter is only necessary to the extent the Court has any questions.

III. ADVERSARY PROCEEDING MATTER: *SilverRock Development Company, LLC and RGC PA 789, LLC v. Richard A. Goetz, Lehn E. Goetz, and Does 1-20 – Adv. Case No. 25-50450 (MFW)*

4. Status Conference

Related Documents:

- i. Complaint for Avoidance of Promissory Note and Defendants' Secured Interest in the Deed of Trust Given to Secure the Promissory Note, Under 11 U.S.C. §§ 544, 547, 548, and 550 and California Civil Code §§ 3439.04, 3439.05, 3439.07, Damages Under California Civil Code § 1916-3 et seq and California Constitution, Article XV § 1, Cancellation of Any Interest Owed Under California Civil Code § 1916-2 et seq and to Preserve Avoided Liens and Interests for the Benefit of the Bankruptcy Estates Under 11 U.S.C. § 551 [[Adv. Docket No. 1](#); filed 3/25/2025]
- ii. Response to Complaint; Demand for Jury Trial [[Adv. Docket No. 5](#); filed 4/24/2025]

- iii. Scheduling Order [[Adv. Docket No. 11](#); filed 5/16/2025]
- iv. Plaintiffs' Motion for Entry of an Order (I) Staying Adversary Case; (II) Allowing the Parties to Move at Any Time to Terminate the Stay for Cause; and (II) Granting Related Relief [[Adv. Docket No. 13](#); filed 6/13/2025]
- v. Defendants' Opposition to Plaintiffs' Motion for an Order Staying Adversary Proceeding [[Adv. Docket No. 16](#); filed 6/27/2025]
- vi. Plaintiffs' Reply to Defendants' Opposition to Plaintiffs' Motion for Entry of an Order (I) Staying Adversary Case; (II) Allowing the Parties to Move at Any Time to Terminate the Stay for Cause; and (II) Granting Related Relief [[Adv. Docket No. 17](#); filed 7/7/2025]
- vii. Notice of Completion of Briefing Concerning Plaintiffs' Motion for Entry of an Order (I) Staying Adversary Case; (II) Allowing the Parties to Move at Any Time to Terminate the Stay for Cause; and (II) Granting Related Relief [[Adv. Docket No. 19](#); filed 7/10/2025]
- viii. Joint Status Report [[Adv. Docket No. 22](#); filed 12/11/2025]
- ix. Stipulation to Dismiss the Adversary Proceeding Without Prejudice [[Adv. Docket No. 23](#); filed 12/11/2025]

Status: The status conference was set at the request of the Court. Due to the filing of the dismissal stipulation at Adv. Docket. No. 23, the parties request that the status conference be cancelled. However, counsel to the parties will be in attendance and available if the Court has questions with respect to this proceeding or its status.

IV. MATTER GOING FORWARD:

- 5. Debtors' Motion for Entry of an Order (I) Appointing a Mediator; (II) Referring Matter to Mandatory Mediation; (III) Authorizing and Approving the Mediation Procedures; (IV) Determining the Value of the Secured Claims of Certain Creditors Pursuant to 11 U.S.C. § 506(a) of the Bankruptcy Code and Bankruptcy Rule 3012; (V) Authorizing the Debtors to Surcharge Collateral Pursuant to 11 U.S.C. § 506(c); and (IV) Granting Related Relief [[Docket No. 834](#); filed 12/10/2025]

Response Deadline: At or prior to the beginning of the hearing.

Responses Received: None at this time.

Related Documents:

i. Order Shortening Notice Regarding Debtors' Motion for Entry of an Order (I) Appointing a Mediator; (II) Referring Matter to Mandatory Mediation; (III) Authorizing and Approving the Mediation Procedures; (IV) Determining the Value of the Secured Claims of Certain Creditors Pursuant to 11 U.S.C. § 506(a) of the Bankruptcy Code and Bankruptcy Rule 3012; (V) Authorizing the Debtors to Surcharge Collateral Pursuant to 11 U.S.C. § 506(c); and (IV) Granting Related Relief [[Docket No. 836](#); filed 12/10/2025]

Status: This matter will go forward with respect to approval of the mediation related relief requested by the motion. The Debtors remain in discussions with various parties regarding the same.

Dated: December 12, 2025
Wilmington, Delaware

WILSON SONSINI GOODRICH & ROSATI, P.C.

/s/ Catherine C. Lyons

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Counsel to the Debtors

Schedule 1

Pleadings Index

1. Seventh Monthly Application of Armstrong Teasdale LLP, as Co-Counsel to the Debtors and Debtors in Possession, for Allowance of Compensation and Reimbursement of Expenses Incurred for the period February 1, 2025 to February 28, 2025, filed April 21, 2025 [D.I. 438].
2. Certificate of No Objection - No Order Required with respect to Seventh Monthly Application of Armstrong Teasdale LLP, as Co-Counsel to the Debtors and Debtors in Possession, for Allowance of Compensation and Reimbursement of Expenses Incurred for the Period from February 1, 2025 through February 28, 2025, filed May 13, 2025 [D.I. 476].
3. Combined Eighth Monthly and Final Fee Application and Expense Application of Armstrong Teasdale LLP, as Co-Counsel to the Debtors and Debtors-in-Possession, for Allowance of Compensation and Reimbursement of Expenses Incurred for the Monthly Period from March 1, 2025 Through April 30, 2025 and the Final Application for Allowance of Compensation and Reimbursement of Expenses for the Final Period from August 30, 2025 through April 30, 2025, filed November 10, 2025 [D.I. 790].